June 17, 1980 CD-80-03

Dear Manufacturer:

Subject: Running Change Request Form Guidelines

A new running change request form, CD Form No. 232, is being introduced and takes the place of the forms previously used by EPA for running change purposes. This is being done in order to standardize the running change request procedures and, at the same time, arrange the data, descriptions, and specifications in a more convenient format. It is arranged in fields for ease of computerization and is fully described, field by field, in the appendix to this letter. The new form should be implemented by the manufacturers as soon as possible. EPA considers as obsolete the previous CD Forms Nos. 168 through 172, applicable to light-duty vehicles and heavy-duty engines, and Nos. 196 and 197, for motorcycles.

In addition to the new request form, reporting procedures have changed somewhat:

Each running change shall represent only one engine family. If similar changes are made to other engine families, additional running change requests must be submitted. The only exception to this procedure is the case where a particular change affects a manufacturer's entire product line. In this instance, a manufacturer, instead of inserting the engine family name, writes in the word ALL in the appropriate field.

No amendments to a running change will be accepted. In the past, some manufacturers used the amendment procedure to update a running change to keep their request current with the latest state of ongoing development within the given running change. This causes confusion within the certification team and is resource intensive for EPA. If a particular request must be modified, it must first be withdrawn, updated, renumbered, then resubmitted. We expect that manufacturers will develop their running change calibrations in a responsible manner in order that excessive withdrawals and updates will not be needed.

Any test results must be submitted to EPA in the manner used with data from an original certification emission-data vehicle using the Manufacturer Test Data Sheets (MTDS) and Vehicle

Information Sheets (VIS) (or their machine readable equivalents). In addition, the maintenance and test logs of any vehicle used for running change testing must be submitted along with the other data noted above.

Although not a requirement, we urge manufacturers to use the new running change technique (e.g., the Certification Change Request Form) when making a correction to the application subsequent to certification. EPA believes that this method will pose less of a paperwork burden to the manufacturers if they will utilize the form in lieu of a cover letter.

An example of the form accompanies this letter. Actual copies are available at EPA, MVEL, Ann Arbor. Please direct any inquiries relating to running changes to your certification team leader.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Mobile Source Air Pollution Control

Enclosures

Instructions for Completion of Certification Change Request Form

Card A

- Model Year: Report the last two digits of the applicable model year.

- Manufacturer: Use the three digit manufacturers code as noted on the back of the vehicle Identification Sheet.

- Request number: Any method of numbering running changes may be used as long as it is limited to 11 spaces (alpha numeric).

- Engine Family Name: Use the same engine family name as used for initial certification (alpha numeric).

- Request Type: Check which type the request applies to: a running change, a field fix, or addition of model.

- Request Applies To: Note here--whether the change applies to actual hardware or is a correction to the application for certification only.

Hardware Modification is further broken down into the classes: Physical Specifications and/or Calibration. An example of a change to a physical specification would be a change to a tire size whereas a calibration change would be represented by a change to the basic idle speed. A change to a carburetor main jet would be both a change to a physical specification and a change to a calibration; hence, both boxes should be checked.

Card B

-Address of Change: Please refer to the Certification Application Format pertinent to the model year for which the original certificate was applied and note that each section and subject within the application has its separate section address (i.e., Facility and Equipments address is 04.00.00.00, while Engine Family Descriptions-Four Stroke Cycle reciprocating Engines is located at 10.00.00.00 and is further broken down into exhaust manifold configuration at 10.02.15.00). It is important that the finest address representing the part or area to be modified by the change request be used.

- Reason for Change: Insert here the code found on the rear face of the certification change request form which best corresponds to the reason for the running change submittal.

Cards C and D

- Engine Code Description: It is imperative that a new engine code be generated whenever a change affects the definition of a particular engine code. This maintains the necessary separations of the unique configurations. Maintain a sequence of relationships between the former code and future code by always situating the related codes side by side. Only one code per segment is permitted (i.e., eight codes maximum per form) (alpha numeric).

Cards E, F, and G

These three lines will be used to describe the nature of the change request.

This portion of the change request form is used by the certification team to perform a basic evaluation in order to determine if the test data a manufacturer has submitted with the change are adequate or in the absence of data will be used in the determination of appropriate test requirements.

Manufacturers are urged to clearly describe the change request to the best of their ability. If a team member has difficulty in understanding the description of a particular running change request it will be returned to the manufacturer for clarification.

- Proposed Implementation Date: Note here the date the manufacturer plans to implement this change in final vehicle production. For instance, an engine modification may be made in the foundry weeks or months before the change is actually incorporated into a production vehicle.

- Alternate Procedure: Note here whether or not a particular running change is to be implemented utilizing the alternate procedure described at 40 CFR 86.081-34.

- Alternate Manufacturer Code: Insert here the code of the

manufacturer of the durability-data vehicle whose deterioration factors will be applied to the test results used to qualify the running change request if that manufacturer is different than the manufacturer of the vehicle used to qualify the running change request, or if the running change test vehicle has been produced by another manufacturer.

- Test Requirement Code, Test Identification Code, and Other Requirements: These fields will be completed by either the manufacturer's or EPA's personnel to describe the testing performed or to be performed to qualify the running change request. (These codes are listed in the rearface of the running change request.)

- Specifications (As Applicable): These descriptions are to be used by either EPA's or the manufacturer's personnel to describe the test vehicle's specifications, as outlined and described further in the application format. Space for descriptions of up to four test vehicles has been provided. Extra sheets may be used if necessary. If a manufacturer performs testing prior to submission, in addition to supplying MTDS and VIS, he should complete the portion of the request form provided for the reporting of emission results. These descriptions are introduced into the data base via the MTDS and VIS, not by this form. They appear here as a convenient means of describing the test vehicle.

  -HC: Enter the "weighted mass" hydrocarbon emission value generated during the test. This value should be rounded to the number of places to the right of the decimal point indicated by expressing the applicable emission standard to three significant figures.

  -CO: Enter the "weighted mass" carbon monoxide emission value generated during this test. This value should be rounded to the number of places to the right of the decimal point indicated by expressing the applicable emission standard to three significant figures.

  -NOx: Enter the "weighted mass" NOx emission value generated during the test. This value should be rounded to the number of places to the right of the decimal point indicated by expressing the applicable emission

standard to three significant figures.

-Evap.: Enter the total evaporative emissions loss from this test. This value should be rounded to the number of places to the right of the decimal point indicated by expressing the applicable emission standard to three significant figures.

-CO_2: Enter the "weighted mass" CO_2 emission value generated during this test. This value should be rounded to the number of places to the right of the decimal point indicated by expressing the applicable emission standard to three significant figures.

Card I

-None.

Card J

-Test VID and Respective VI Version: Enter here the VI of the test vehicle and VI version.

Cards K, L, and M

Cards K, L, and M are self-explanatory.

General Instructions

-Use the standard rules of justification when completing the form (i.e. alpha numeric-left and numeric-right. Assume a field is justified numeric unless otherwise stated.

-Entry in columns not defined by input blocks is not permitted.